

Exhibit J

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10 UNITED STATES BANKRUPTCY COURT
11 DISTRICT OF NEVADA

12 In re
13 META MATERIALS INC.,
14 Debtor.

Case No.: 24-50792-hlb
(Chapter 7)

**FIRST AMENDED DECLARATION OF
JAMES W. CHRISTIAN IN SUPPORT OF
APPLICATION BY CHAPTER 7
TRUSTEE TO EMPLOY THE LAW FIRM
OF CHRISTIAN ATTAR AS SPECIAL
COUNSEL [F.R.BANKR.P. 2014]**

Hearing Date: N/A
Hearing Time:

18 James W. Christian, under penalty of perjury of the laws of the United States, declares:

- 19 1. I am a resident of Texas, and I am a member in good standing with the State Bar of
20 Texas since 1978. My C.V. is attached hereto as Exhibit "A".
- 21 2. I have personal knowledge of the matters stated herein.
- 22 3. I am the senior partner in the law firm of Christian Attar ("Christian Attar"), located
23 in Houston, Texas. Christian Attar does not hold any interest adverse to the Meta Materials, Inc.
24 chapter 7 estate ("Estate"), or any of its related subsidiaries.
- 25 4. To the best of my knowledge, there are no connections which Christian Attar,
26 and/or any of its employees, have with the Estate's creditors, shareholder or other parties-in-
27 interest and their respective attorneys and accountants, the United States Trustee, and any person
28 employed in the office of the United States Trustee, related to this matter.

1 5. Since my Declaration executed on October 31, 2024, [ECF No. 99], I was asked by
2 Next Bridge Hydrocarbon, Inc. ("Next Bridge") to defend it against numerous pro se lawsuits filed
3 in the Western District of Texas (the "Pro Se Cases"). A list of the Pro Se Cases are as follows:

- 4 • Case No. 24-cv-00317-DC-RG *Contique Willcot v. Securities and Exchange*
5 *Commission, et al*; In the United States District Court Western District of Texas
6 Midland-Odessa Division
- 7 • Case No. 7:24-CV-321-DC-RCG; *Danielle Spears v. Next Bridge*
8 *Hydrocarbons, Inc., et al*; In the United States District Court Western District
9 of Texas Midland-Odessa Division
- 10 • Case No. 7:24-CV-322; *Matthew J. Pease v. Securities & Exchange*
11 *Commission, et al*; In the United States District Court for the District of Western
12 Texas

13 6. In addition, the same group of collective pro se plaintiffs have filed numerous other
14 pro se lawsuits (the Other Pro Se Lawsuits) in which Christian Attar is not involved. The point
15 being it is important for the Court to understand the scope and intent of what the pro se plaintiffs
16 have done to harm Meta. Some of the Other Pro Se Lawsuits have been filed but not served. *See*
17 Exhibit "B" attached hereto.

18 7. It is my belief that the Pro Se Cases and the Other Pro Se Lawsuits are a coordinated
19 effort to obstruct the efforts of the Bankruptcy Estate to hold accountable all parties who previously
20 manipulated the securities of Meta Materials, Inc. ("Meta"). This includes many of the Pro Se
21 Cases suing former officers and/or directors of Meta.¹

22 8. The full factual analysis that act as a basis of my belief that the Pro Se Cases are a
23 coordinated effort, is more fully set forth in my letter to Trustee's counsel, Jeffrey Hartman dated
24 April 16, 2025, attached as Exhibit "D" (including all exhibits therein) (hereinafter the "Letter").
25
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27

28 ¹ Note that in some Pro Se Cases notice of bankruptcy has been filed due to the automatic stay in place.
See Exhibit "C" attached hereto.

1 9. As stated in the Letter, I did not (and still do not) believe Christian Attar's
2 representation of Next Bridge in the Pro Se Cases was a conflict or caused me to cease to be
3 disinterested. However, after further consideration, I have decided to withdraw from representing
4 Next Bridge in the Pro Se Cases as I do not want this onslaught of the Pro Se Cases (and my
5 involvement therein) to continue to harass the office of the Trustee, Christina Lavato, and more
6 importantly this Honorable court, the Honorable Hilary L. Barness presiding.

7 10. Lastly, as set forth in the Letter, our firm will be filing a case ("New Case") on
8 behalf of Next Bridge against certain defendants alleging tortious interference with the Orogrande
9 Lease, certain existing and potential relations of Next Bridge and related claims.

10 11. The New Case will be on behalf of Next Bridge only and has nothing to do with,
11 and is in no way related to Meta, the Bankruptcy Estate or otherwise.

12 12. As such, there is no conflict for the Christian Attar firm and its attorneys to handle
13 the New Case.

14 13. Accordingly, once the New Case is filed on behalf of Next Bridge, Christian Attar
15 will still remain disinterested persons (within the meaning of 11 U.S.C. § 101(14) and 327 and
16 328).

17 DATED: April 23, 2025.

18 **CHRISTIAN ATTAR**

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21 James W. Christian, Esq.